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LAW OFFICES

COHN AND MARKS

STANLEY S. NEUSTADT  
STANLEY B. COHEN  
RICHARD M. SCHMIDT, JR.  
JOEL H. LEVY  
ROBERT B. JACOBI  
ROY R. RUSSO  
RONALD A. SIEGEL  
LAWRENCE N. COHN  
RICHARD A. HELMICK  
WAYNE COY, JR.

MARK L. PELESH  
J. BRIAN DE BOICE  
ALLAN ROBERT ADLER  
CHARLES M. OLIVER

OF COUNSEL  
MARCUS COHN  
LEONARD H. MARKS

SUSAN V. SACHS  
JOHN R. PRZYPYSZNY  
WILLIAM B. WILHELM, JR. \*

\*MEMBER PENNSYLVANIA BAR ONLY

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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.

SUITE 600

1333 NEW HAMPSHIRE AVENUE, N. W.  
WASHINGTON, D. C. 20036-1573

TELEPHONE (202) 293-3860

TELECOPIER (202) 293-4827

DIRECT DIAL:

(202) 452-4857

July 11, 1994

William F. Caton  
Acting Secretary  
Federal Communications Commission  
Washington, D.C. 20554

RE: Ex Parte Meeting Concerning PR Docket No. 93-61

Dear Mr. Caton

On Thursday, July 7, 1994, the undersigned, as counsel to the Interagency Group, met with Marty Liebman, Deputy Chief, and John Borkowski, Senior Attorney, of the Rules Branch of the Private Radio Bureau's Land Mobile & Microwave Division to discuss the status of the above-referenced proceeding and its possible impact on the Group's regional electronic toll collection project known as the E-ZPass Plan.

The Interagency Group consists of the New Jersey Highway Authority, the New Jersey Turnpike Authority, the New York State Thruway Authority, the Port Authority of New York & New Jersey, the South Jersey Transportation Authority, and the Triborough Bridge and Tunnel Authority.

At the meeting, Mssrs. Liebman and Borkowski each received copies of the attached materials regarding the nature of the EZPass Plan and the position of the Interagency Group concerning the above-referenced pending proceeding.

Sincerely,

*Allan R. Adler*  
Allan R. Adler

Attachment

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MAY 11 1994  
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INTERAGENCY GROUP

Contacts:

Atlantic City Expressway  
Rich Woolston  
(609) 965-6060 x41

Garden State Parkway  
Dennis Ingoglia  
(908) 442-8600 x6503

New Jersey Turnpike Authority  
Lynn Fleeger  
(908) 247-0900 x5601

New York State Thruway Authority  
John Cardillo  
(518) 436-2983

Pennsylvania Turnpike Commission  
Mike Kennedy  
(717) 938-9551 x2920

Port Authority of NY & NJ  
Terry Benczik  
(212) 435-7777

Triborough Bridge & Tunnel Authority  
Frank Pascual  
(212) 468-8460

FOR IMMEDIATE RELEASE  
March 18, 1994

A seven-agency group representing toll authorities in New York, New Jersey and Pennsylvania today announced the selection of a manufacturer to furnish a compatible electronic toll collection system which will be recommended to each agency's governing board. The system is designed to increase customer convenience and reduce toll plaza congestion.

Mark IV IVHS Inc. of Amherst, N.Y., was selected to provide the tag and reader equipment for the system, named E-ZPass by the Interagency Group, that will be used on toll roads, bridges and tunnels in the three states. Collectively, facilities operated by the seven agencies serve more than four million customers daily.

The selection was made following more than two years of cooperation among the seven agencies -- the New Jersey Highway Authority (operator of the Garden State Parkway), New Jersey Turnpike Authority, New York State Thruway Authority, Pennsylvania Turnpike Commission, Port  
more



THE PORT AUTHORITY  
OF NY & NJ



Triborough Bridge and Tunnel Authority  
Metropolitan Transportation Authority

Authority of New York and New Jersey, South Jersey Transportation Authority (operator of the Atlantic City Expressway) and the Triborough Bridge and Tunnel Authority. As a result of this unprecedented alliance, there will be a one-tag system that will maximize customer convenience in the three states.

Implementation plans call for the installation of E-ZPass technology by each of the individual agencies using a phased approach. Beginning in early 1995, full implementation is expected to be complete by 1998.

E-ZPass will eliminate the need for motorists to exchange cash, tokens or tickets at a toll booth. Instead, tolls will be paid electronically as a vehicle passes through the toll lane. When fully implemented, E-ZPass will be available at all participating toll facilities in the tri-state region.

Today's selection culminates extensive testing of read/write technology tag and reader equipment from both Mark IV IVHS Inc. and Amtech Systems Corporation of Dallas, Texas. The read/write technology is considered state-of-the-art for the transportation industry. In addition to the Interagency Group-sponsored tests, several regional toll authorities have conducted individual tests of various types of electronic toll collection (ETC) equipment and have shared the results.

Vehicles using E-ZPass will be equipped with a small electronic device, known as a tag, that communicates vehicle information to equipment in the toll lanes that collect and transmit data to and from the tags. The data are then processed

more

and the appropriate toll charged to, or credited against, the customer's account. Each individual agency will establish E-ZPass customer account procedures for customers using its toll facilities. Special attention will be given to ensure that account procedures and policies are as consistent as possible among the agencies for the benefit of their shared customers.

Each agency will be implementing E-ZPass at its facilities in accordance with local operating conditions with the overall objective of maximizing safety and convenience. Some agencies may offer E-ZPass with a brief stop in the toll lane, while others may offer it with "roll through" at a slow speed. For customers who do not choose to use E-ZPass, the existing means of paying tolls will continue to be available at each agency.

The New York State Thruway Authority (NYSTA) has dedicated, non-stop "E-ZPass Only" lanes at its recently introduced interim E-ZPass installations at the Tappan Zee Bridge, Spring Valley and Yonkers toll plazas in the New York City area and at the Grand Island Bridges, located north of Buffalo. The NYSTA will convert these sites to the Mark IV technology.

end

For further information contact:

Rich Woolston, Atlantic City Expressway, (609) 965-6060 x41;  
Dennis Ingoglia, Garden State Parkway, (908) 442-8600 x6503;  
Lynn Fleeger, New Jersey Turnpike Authority, (908) 247-0900 x5601;  
John Cardillo, New York State Thruway Authority, (518) 436-2983;  
Mike Kennedy, Pennsylvania Turnpike Commission, (717) 939-9551 x2920  
Terry Benczik, The Port Authority of NY and NJ, (212) 435-7777;  
Frank Pascual, Triborough Bridge & Tunnel Authority, (212) 468-8460

October 1, 1993

JUL 11 1994

Summary Position of the Interagency Group ("IAG")  
concerning the  
FCC's Notice of Proposed Rulemaking ("NPRM")  
to Revise Current AVM Regulations

The IAG consists of 7 New York, New Jersey and Pennsylvania toll agencies that are jointly implementing the "E-ZPass Plan," a coordinated electronic toll collection plan which will ultimately include all of the toll river crossings to New York City, other major toll portals (i.e., Goethals and Verrazano Narrows Bridges), and toll collection points along major intra- and interstate roads (i.e., the New Jersey Turnpike, the New York State Thruway, the Garden State Parkway, the Pennsylvania Turnpike, and the Atlantic City Expressway).

Interoperable and compatible "automatic vehicle monitoring" ("AVM") systems are essential to the success of the E-ZPass Plan, and the IAG is now testing systems from competing vendors based on different technologies that operate in the 904-912 MHz and 918-926 MHz radio frequency bands.

The IAG agrees that the 20-year old "interim" AVM rules that are currently in effect should be revised and improved to promote continued development of AVM systems and applications. However, the IAG believes that rules proposed by the FCC would inhibit, rather than enhance, the rapid progress now being made toward a diverse and competitive AVM service marketplace in which users can choose among a variety of technologies and systems to obtain the ones best suited to their needs.

The major problem with the NPRM is that the FCC has allowed interference disputes between providers of different AVM systems to overshadow its regard for the needs of AVM service users in shaping its proposed rules.

The FCC's proposal to segregate the 902-928 MHz AVM band into separate allocations for "wide-band, pulse-ranging" and "narrow-band" AVM systems is an unnecessary and unwise response to the interference problems experienced by some AVM service providers. It would constitute a significant shift away from the "shared band" approach of the current rules toward an "exclusive use" allocation that would

- \* stifle incentives for providers to avoid or resolve interference problems through improved technologies and voluntary coordination efforts; and,
- \* deprive AVM service users of the diverse, competing provider options they must have in order to make cost-effective, performance-based choices among available AVM systems.

The NPRM distinction between "wide-band, pulse-ranging" AVM systems and "narrow-band" AVM systems is a misleading basis for categorizing current AVM systems because it focuses on how much spectrum a system uses, rather than its geographic coverage and functionality. It ignores technological developments in the AVM field and should not become the regulatory basis for determining frequency assignments for AVM services in the future.

Apart from misplacing the interests of AVM service providers above those of AVM service users, the FCC's proposed rules fail to address an important public interest in meeting the special needs of Government and quasi-Government entities, such as the members of the IAG, who are implementing plans for large-scale, publicly-funded electronic toll and traffic management (ETTM) AVM services consistent with the Congressional mandate for the development of "intelligent vehicle-highway systems."

The IAG has urged the FCC to retain the "shared spectrum" approach and to adopt AVM service rules that provide regulatory predictability without eliminating the market flexibility required for the continuing development of AVM products and applications. In addition, it has urged the FCC to adopt special public interest rules to expressly provide for the co-primary status, extended "build-out" schedules, blanket license authorizations, and other special considerations necessary to facilitate the implementation of massive, multi-jurisdictional public service AVM projects, such as the E-ZPass Plan.

The Interagency Group

New Jersey Highway Authority  
New Jersey Turnpike Authority  
New York State Thruway Authority  
Pennsylvania Turnpike Commission  
Port Authority of N.Y. and N.J.  
South Jersey Transportation Authority  
Triborough Bridge and Tunnel Authority

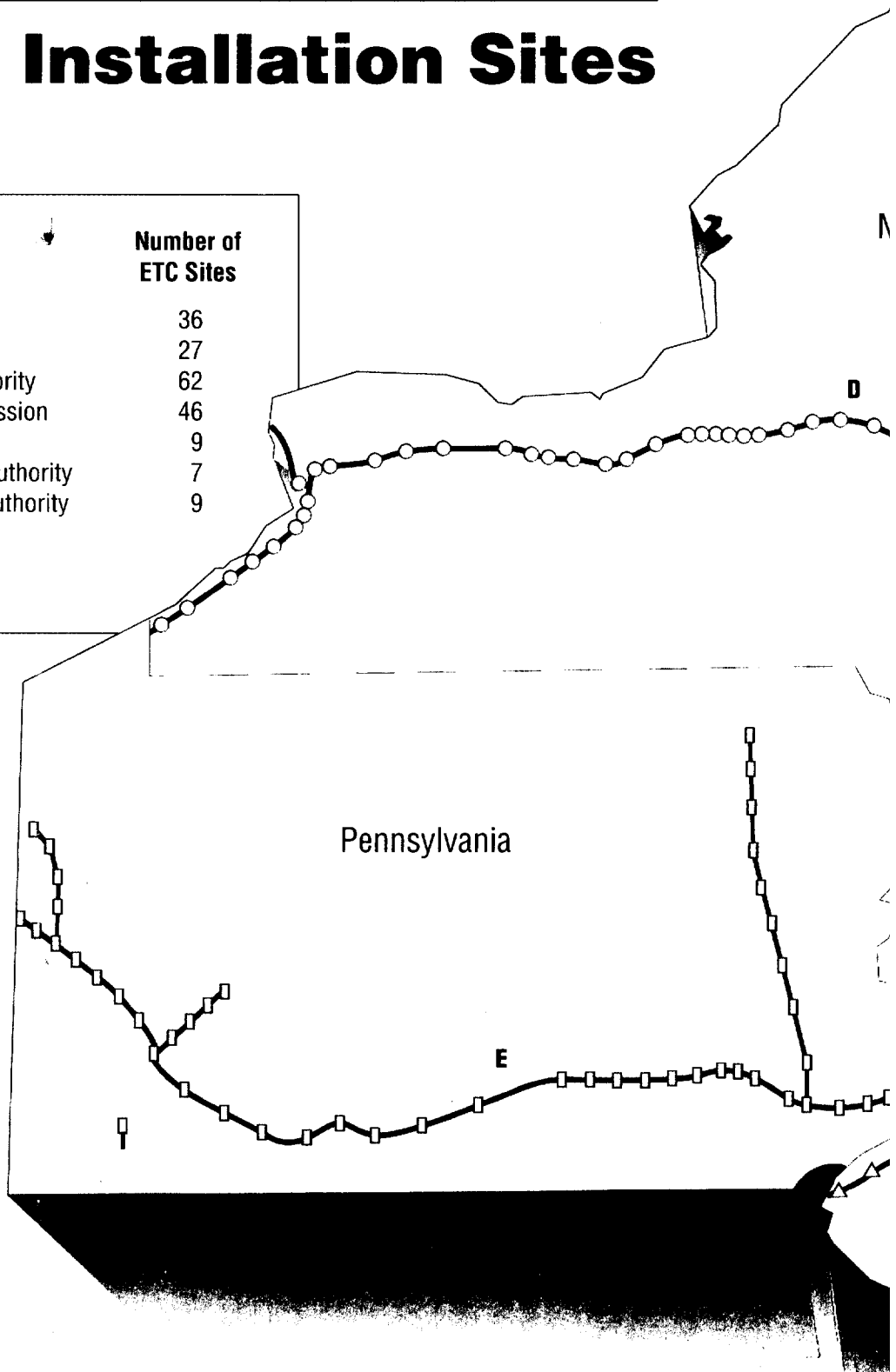


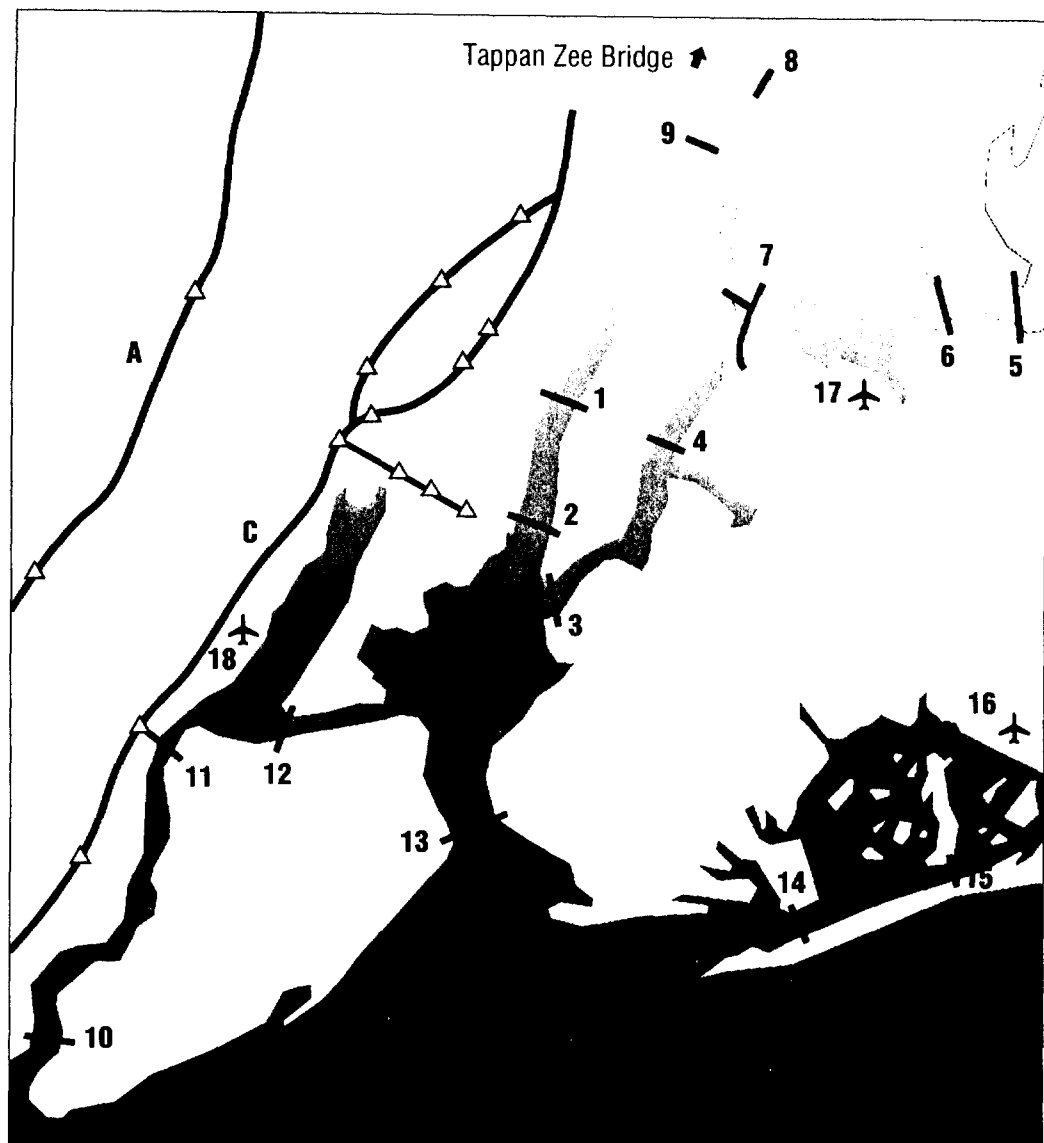
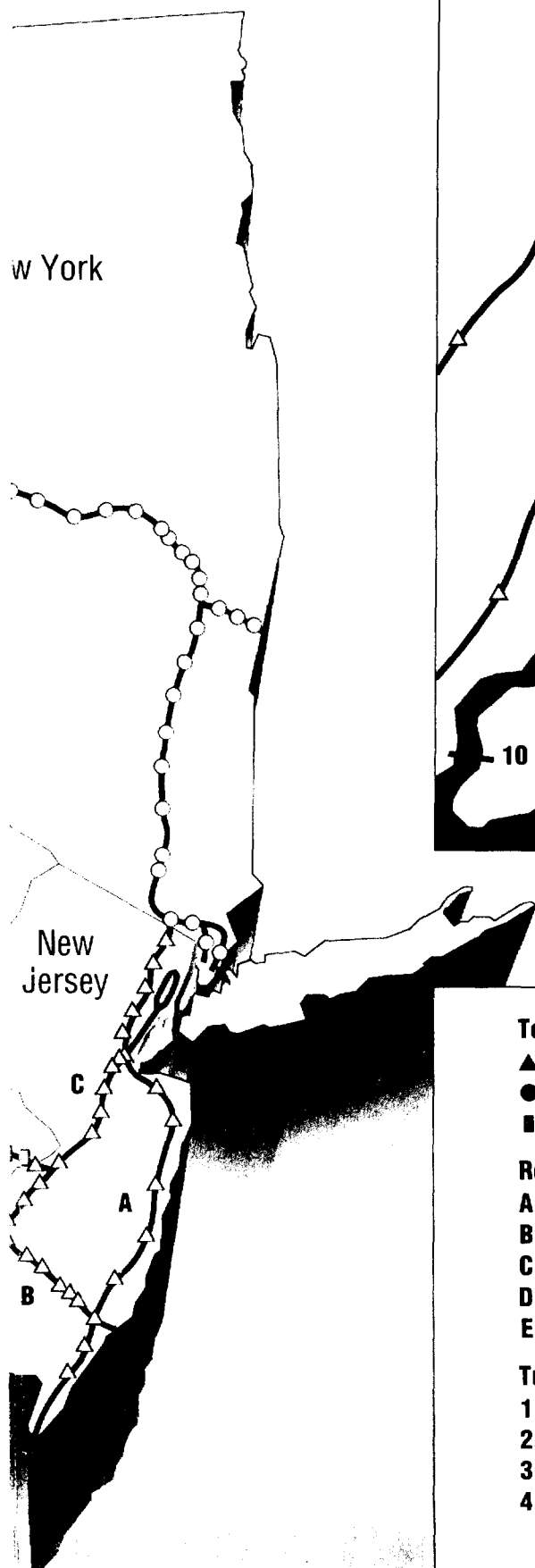
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## Projected Installation Sites

Agency	Number of ETC Sites
New Jersey Highway Authority	36
New Jersey Turnpike Authority	27
New York State Thruway Authority	62
Pennsylvania Turnpike Commission	46
Port Authority of NY & NJ*	9
South Jersey Transportation Authority	7
Triborough Bridge & Tunnel Authority	9

\*Includes 3 Airports





#### Toll Facilities

- ▲ New Jersey Toll Facilities
- New York Toll Facilities
- Pennsylvania Toll Facilities

#### Roadways

- A. Garden State Parkway
- B. Atlantic City Expressway
- C. New Jersey Turnpike
- D. New York State Thruway
- E. Pennsylvania Turnpike

#### Tunnels

- 1. Lincoln Tunnel
- 2. Holland Tunnel
- 3. Brooklyn-Battery Tunnel
- 4. Queens-Midtown Tunnel

#### Bridges

- 5. Throgs Neck Bridge
- 6. Bronx-Whitestone Bridge
- 7. Triborough Bridge
- 8. Henry Hudson Bridge
- 9. George Washington Bridge
- 10. Outerbridge Crossing
- 11. Goethals Bridge
- 12. Bayonne Bridge
- 13. Verrazano-Narrows Bridge
- 14. Marine Pkwy.-Hodges Mem. Br.
- 15. Cross Bay Veterans Mem. Br.

#### Airports

- 16. John F. Kennedy Airport
- 17. LaGuardia Airport
- 18. Newark International Airport





February 1994

## **E-ZPass<sup>sm</sup> FACT SHEET ELECTRONIC TOLL COLLECTION**

### *What is electronic toll collection and how does it work?*

Electronic toll collection (ETC) is a method of toll collection that eliminates the need for cash to change hands at a toll booth. Instead, vehicles are equipped with a small electronic device, or tag, that transmits vehicle and account information from the tags. The data are processed and the appropriate toll is charged to, or credited against, the customer's account. (Refer to Exhibit 1)

### *What are the benefits of ETC?*

ETC offers convenience. ETC will allow motorists in this region to use the same tag at many different bridges, tunnels and highways. Toll authorities in New York, New Jersey and Pennsylvania are working cooperatively to introduce the same system at all toll facilities. This will allow an ETC user to travel through these states without once lowering a window or searching for cash or coins, and ultimately without even stopping at some of the facilities. All their tolls will be recorded electronically.

Additionally, ETC may allow for an overall increase in processing traffic through toll plazas, as well as decreased congestion and fewer delays. It may also improve air quality and reduce fuel consumption, important goals of the Federal Clean Air Act.

ETC can also serve to monitor travel time on critical elements of the regional highway system. TRANSCOM, a coalition of the region's 15 major transportation agencies, is undertaking an operational test using data from vehicles equipped with ETC. This will enable TRANSCOM and its member agencies to use these vehicles as probes on the highway network to determine real-time traffic information and identify incidents (i.e. accidents, vehicle breakdowns) and expedite responses.



**THE PORT AUTHORITY  
OF NY & NJ**



**M** **Triborough Bridge and Tunnel Authority**  
Metropolitan Transportation Authority

*Where is ETC used now?*

In July 1989, the Port Authority began electronic toll collection at the Lincoln Tunnel for buses using the Exclusive Bus Lane (XBL) during the morning peak period. On a typical weekday over 1,500 buses roll by the ETC equipment without stopping, thus speeding their customers' trips. The New York State Thruway Authority recently introduced E-ZPass in the New York City and Buffalo areas. They are committed to converting to the technology selected by the regional group. ETC systems also currently operate successfully in Louisiana, Texas, Oklahoma and Colorado, as well as in Europe and other countries around the world.

*How are toll authorities bringing ETC to this region?*

The New York, New Jersey and Pennsylvania toll authorities joined together through a group known as the E-ZPass Interagency Group. By working together, the agencies expect to offer maximum convenience to their customers - many of whom use the facilities of more than one agency - and streamline toll operations. The Group has evaluated and tested tag and reader equipment for a one-tag system. The name for the one-tag system in this region is E-ZPass.

*Does ETC work?*

Electronic toll collection is already working at toll facilities in Louisiana, Texas, Oklahoma, Colorado and at the Lincoln Tunnel between New Jersey and New York. In Europe, electronic toll collection is extensively used in France, Italy and other countries. These systems have been running for a number of years with great success. The New York State Thruway Authority is also operating electronic toll collection at select toll plazas on their system.

*If you know ETC works, why are you continuing to test it so extensively?*

In order for the toll authorities in this region to provide a one-tag system, we require Read/Write technology. The system that is being presently tested is a Read/Write system that will allow information to flow in both directions between the vehicle tag and the tollbooth antenna.

In addition, each agency involved in the E-ZPass Interagency Group has particular needs which must be addressed by the system that is ultimately adopted by the seven agency group. Other systems operating in the country are predominantly Read-Only systems, and are installed on one agency's toll road, not seven, so implementing was not as complicated. (Refer to Exhibit 2)

*Will I really be able to pay a toll without stopping?*

Electronic toll collection systems are operating at some facilities in Europe and the United States, and non-stop payment of tolls is already a reality at some of these locations. However, in this region, a non-stop system depends on many factors including the number of motorists using E-ZPass, overall traffic, space availability at the toll plaza and safety conditions. Each agency will be offering E-ZPass at its facilities in accordance with operating conditions with the overall objective of maximizing safety and convenience. The New York State Thruway Authority is operating non-stop dedicated "E-ZPass Only" lanes at select toll plazas.

*How will you pay for E-ZPass?*

Agencies are considering various options for customer E-ZPass accounts. Some agencies will electronically deduct the toll transaction from a customer's prepaid account. Other agencies are considering billing their customers. Options for paying for these accounts may include electronic funds transfer, cash, check, money order and/or debit or credit card.

A long term goal of the E-ZPass Interagency Group is to establish a one-account system, like a clearinghouse or a Customer Service Center, which would enable customers to establish and maintain accounts at a centralized place rather than at individual agencies.

*When will E-ZPass be introduced in this region?*

Agency timetables vary but it is expected that implementation will be phased in over the next several years. The first applications of E-ZPass have already taken place in the New York City area, at the following toll plazas of the New York State Thruway: Spring Valley, Tappan Zee Bridge and Yonkers. The New York State Thruway Authority (NYSTA) also introduced E-ZPass at the Grand Island toll plaza, located in the Buffalo area. The NYSTA is committed to converting to a regional system, upon selection of the read/write technology by the Interagency Group.

For further information on E-ZPass, please contact the agency of interest at the number indicated:

Atlantic City Expressway	(609) 965-6060 x41	Rich Woolston
Garden State Parkway	(908) 442-8600 x6503	Dennis Ingoglia
New Jersey Turnpike Authority	(908) 247-0900 x5601	Lynn Fleeger
New York State Thruway Authority	(518) 436-2983	John Cardillo
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Port Authority of New York and New Jersey	(212) 435-7777	Terry Benczik
Triborough Bridge and Tunnel Authority	(212) 468-8460	Frank Pascual

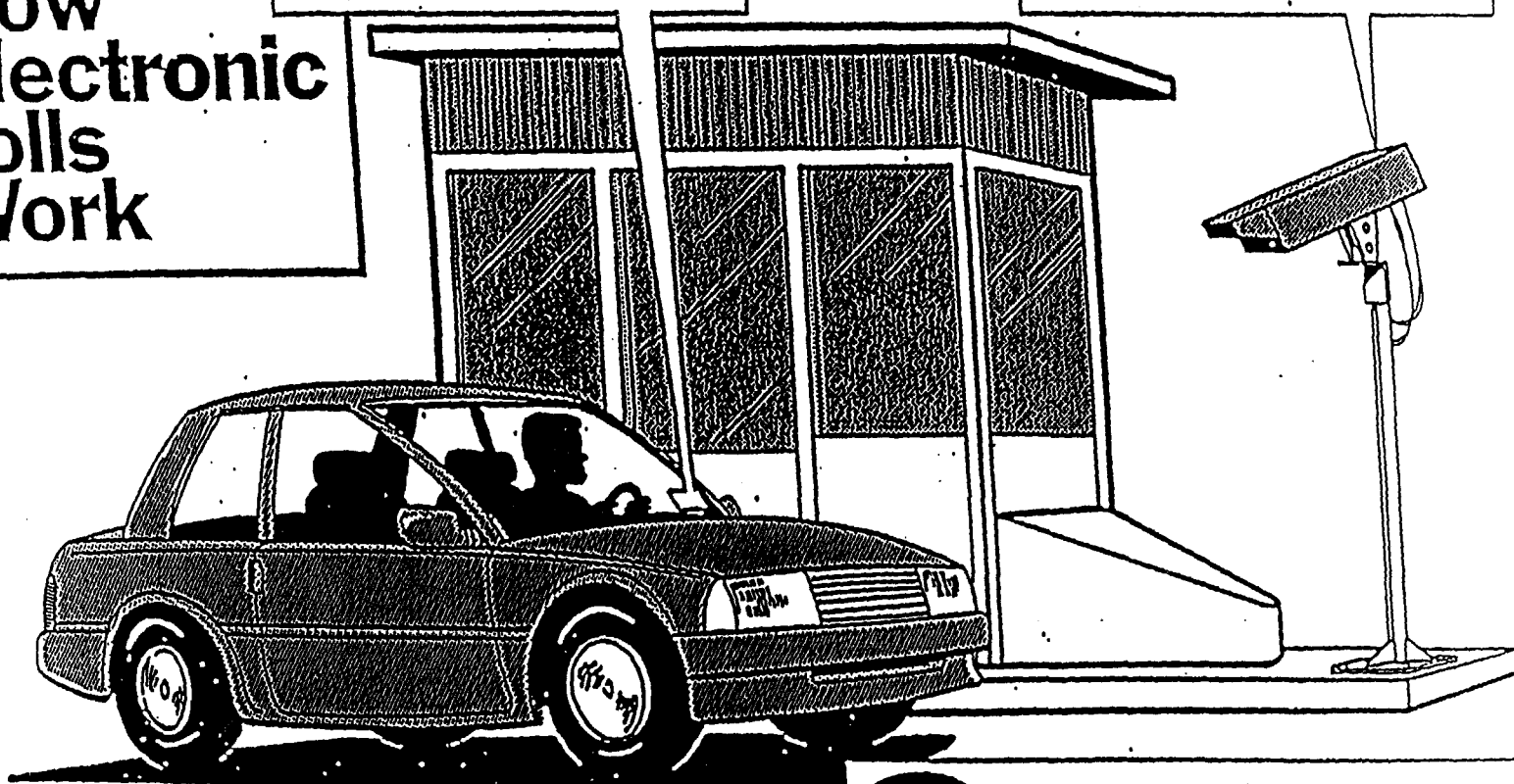
# How Electronic Tolls Work

**1**

Motorist places "tag" on vehicle (here shown on windshield), which sends a signal that identifies vehicle.

**2**

As the vehicle passes through the toll plaza, an electronic detector communicates with the vehicle's tag.



**3**

Information is relayed electronically to a control center. The cost of the toll is applied to a motorist's account.

## **DIFFERENCES BETWEEN READ/ONLY AND READ/WRITE TECHNOLOGY**

### **WHAT IS READ/ONLY?**

In a typical Read/Only system, the antenna is located downstream of the toll booth and directed toward approaching traffic. The antenna emits an RF signal to the tag, sometimes referred to as a transponder, which contains electronics and a small internal antenna and is mounted on the vehicle. Upon receiving the RF signal, the tag sends back a signal to the antenna, which relays the signal to the reader. The reader decodes the signal and identifies a customer account.

### **WHAT IS READ/WRITE?**

In a Read/Write system, the antenna is also located downstream of the toll booth and directed toward approaching traffic. A Read/Write system operates the same as a Read/Only system, but goes a step further. It stores information regarding the customer's trip on the tag. This feature could aid in traffic management applications and makes it easier for toll collection on closed (ticket-type) systems such as the NJ Turnpike, the NYS Thruway and the Pennsylvania Turnpike. As an example, on a toll road such as a Turnpike, when a vehicle enters the toll road, the system first reads the tag and then writes information concerning the point of entry to the tag. This entry point information is read later when the vehicle exits the toll road for the purpose of debiting/charging the account for the appropriate toll amount.